

EXHIBIT A

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, et al.)	
)	
Plaintiffs,)	
)	
vs.)	05-CV-0329 TCK-SAJ
)	
TYSON FOODS, INC., et al.,)	
)	
Defendants.)	

**TYSON FOODS, INC.'S RESPONSES TO STATE OF OKLAHOMA'S
JULY 10, 2006 SET OF REQUESTS FOR PRODUCTION**

COMES NOW Defendant, TYSON FOODS, INC. (hereinafter referred to as "Defendant" or "Tyson"), and for its responses to State of Oklahoma's July 10, 2006 Requests for Production to Tyson Foods, Inc. states as follows:

GENERAL OBJECTIONS

1. Each of the following responses is made without waiving any objections Defendant may have with respect to the subsequent use of these responses or any documents identified in response to these requests.

2. Tyson objects to, and does not agree to subject itself to, the arbitrary and extraordinary "definitions" ascribed by the Plaintiff to certain terms as set forth in its July 10, 2006 Set of Requests for Production to Tyson Foods, Inc. To the extent that such terms appear in the Requests for Production of Documents and are in excess of the requirements of the Federal Rules of Civil Procedure, Tyson instead ascribes to the ordinary, everyday, and reasonably, commonly understood meanings which apply to such terms, and which also comply with the Federal Rules of Civil Procedure. Tyson objects to the definitions to the extent they assume

facts not in evidence or are related to facts or contentions in dispute in this action. Tyson also specifically objects to the following definitions:

- a. The definition of the term "You" is overly broad and includes within its scope persons and/or entities distinct from Tyson, and it includes within its scope persons who are protected from disclosure. Accordingly, Tyson submits these responses on behalf of itself and not for any other person or entity, including any person or entity that raises poultry under contract with Tyson.
- b. The definition of the term "documents and materials" is overly broad. Tyson submits these responses consistent with the definition of "documents" set forth in Fed.R.Civ.P. 34(a).
- c. The definition of the term "run-off/discharge/release" is overly broad, vague and misleading, and includes within its scope both acts of nature and volitional or negligent acts of persons, which cannot be characterized by a single term.
3. Tyson objects to any purported requirements of Plaintiff's discovery requests that are beyond the requirements of the Federal Rules of Civil Procedure.
4. Tyson objects to each and every discovery request to the extent that it seeks a response, document, information, or item which is protected from discovery and privileged by reason of: (a) the attorney-client communication privilege; (b) the "work product" doctrine; (c) the "trial preparation" doctrine; (d) the joint defense or "co-party" privilege; or (e) any other applicable discovery rule or privilege.
5. Tyson objects to any discovery request that seeks a response or document that would disclose mental impressions, conclusions, opinions, or legal theories of any representative of or attorney for Tyson concerning this lawsuit.

6. Tyson objects to each and every request to the extent it seeks information or the identification of documents concerning any claims or occurrences other than the claims and occurrences set forth in Plaintiff's First Amended Complaint for which Plaintiff requests relief.

7. Tyson objects to each request to the extent it seeks or relates to information or the identification of documents which are available to the public, and thus, equally available to Plaintiff.

8. Tyson objects to each request to the extent it seeks or relates to information or the identification of documents which are protected as confidential business information and proprietary and confidential trade secrets.

9. When the following responses state that Tyson will produce certain documents, or that responsive documents will be produced for a particular time period, Tyson is not assuring or guaranteeing that such documents for the particular time period have in fact been located or identified for production.

10. Tyson incorporates as though fully restated herein all objections and limitations to responses made by every other Defendant to the corresponding request for production of documents.

11. The foregoing objections apply to each and every response herein. By specifically incorporating individual General Objections in any response, Tyson does not waive the application of the remainder of the General Objections to such response.

12. Tyson specifically reserves the following:

- a. all questions and objections as to the privilege, competency, relevance, materiality and admissibility of any documents identified in response to these requests;

- b. the right to object on any or all of the foregoing grounds or on any other proper ground to the use of these responses or documents produced hereunder in any hearing in this proceeding or in any subsequent suit or proceeding;
- c. the right to object on any and all proper grounds, at any time, to other discovery procedures involving or relating to these responses or documents produced hereunder disclosed herein; and
- d. the right, at any time, upon proper showing, to revise, correct, or clarify any of the responses set forth herein.

Subject to these objections and subject to any additional objections set forth hereinafter, Tyson responds to Plaintiff's July 10, 2006 Set of Requests for Production to Tyson Foods, Inc., as follows:

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and materials reflecting, referring to or relating to any contracts between you and poultry growers located in the Illinois River Watershed ("IRW) since 1970, including the contracts themselves, any amendments or changes to the contracts considered, proposed or adopted thereto, and any drafts of the contracts, amendments or changes.

RESPONSE TO REQUEST NO. 1: Tyson objects to Request No. 1 because it is overly broad and unduly burdensome. Request No. 1 seeks the production of documents covering a time period of more than thirty-five years. Tyson does not retain records responsive to Request No. 1. for that length of time. Additionally, Tyson objects to Request No. 1 because it seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence, as it requests documents older than the longest applicable statute of

limitations. Tyson objects to Request No. 1 to the extent it requests the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Subject to and without waiving the foregoing objections or the General Objection, responsive documents may be found in the contract grower files produced to Plaintiff on June 15, 2006 as part of Tyson's Initial Disclosures.

REQUEST FOR PRODUCTION NO. 2: Please produce all documents and materials reflecting, referring to or relating to the ingredients and composition of your present and/or historical feed formulas used at poultry growing operations within the IRW.

RESPONSE TO REQUEST NO. 2: Tyson objects to Request No. 2 because it is overly broad and unduly burdensome. The time period for which Request No. 2 seeks the production of documents is unlimited. Further, Request No. 2 would require the production of each and every document related to feed used in the IRW for the unlimited time period. Tyson objects to Request No. 2 because it seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence, as it requests documents older than the longest applicable statute of limitations. Tyson objects to Request No. 2 to the extent that it seeks the production of documents which are protected from discovery because they contain highly confidential trade secrets. Tyson objects to Request No. 2 to the extent it requests the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Subject to and without waiving the foregoing objections or the General Objection, Tyson will produce its feed formulas utilized for poultry raised under contract with Tyson or by Tyson in the IRW from 2002 to the extent such responsive documents exist and in accordance with the terms of any Confidentiality Order entered in this case.

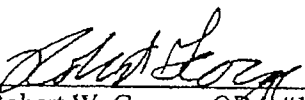
period and is not limited to documents relevant to the IRW. Request No. 124 seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence. Further, Request No. 124 seeks the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Additionally, Tyson objects to Request No. 124 because it assumes facts not in evidence. Subject to and without waiving the foregoing, Tyson's search has not yet identified any documents responsive to this request.

REQUEST FOR PRODUCTION NO. 125: Please produce all documents and materials reflecting, referring to or relating to the destruction of any documents and materials that would have been responsive to any of the above requests for production but due to their destruction are no longer in existence.

RESPONSE TO REQUEST NO. 125: Tyson objects to Request No. 125 as vague and unintelligible. Subject to and without waiving the foregoing objections and the General Objections, Tyson has not identified any documents responsive to this request other than Tyson's document retention policies which will produced upon entry of the Confidentiality Order for this case.

Respectfully Submitted,

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Attorneys for TYSON FOODS, INC.

EXHIBIT B

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, et al.)	
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Plaintiffs,)	
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vs.)	05-CV-0329 TCK-SAJ
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TYSON FOODS, INC., et al.,)	
)	
Defendants.)	

**TYSON POULTRY, INC.'S RESPONSES TO STATE OF OKLAHOMA'S
JULY 10, 2006 SET OF REQUESTS FOR PRODUCTION**

COMES NOW Defendant, TYSON POULTRY, INC. (hereinafter referred to as "Defendant" or "Tyson"), and for its responses to State of Oklahoma's July 10, 2006 Requests for Production to Tyson Poultry, Inc. states as follows:

GENERAL OBJECTIONS

1. Each of the following responses is made without waiving any objections Defendant may have with respect to the subsequent use of these responses or any documents identified in response to these requests.

2. Tyson objects to, and does not agree to subject itself to, the arbitrary and extraordinary "definitions" ascribed by the Plaintiff to certain terms as set forth in its July 10, 2006 Set of Requests for Production to Tyson Poultry, Inc. To the extent that such terms appear in the Requests for Production of Documents and are in excess of the requirements of the Federal Rules of Civil Procedure, Tyson instead ascribes to the ordinary, everyday, and reasonably, commonly understood meanings which apply to such terms, and which also comply with the Federal Rules of Civil Procedure. Tyson objects to the definitions to the extent they assume

facts not in evidence or are related to facts or contentions in dispute in this action. Tyson also specifically objects to the following definitions:

- a. The definition of the term "You" is overly broad and includes within its scope persons and/or entities distinct from Tyson, and it includes within its scope persons who are protected from disclosure. Accordingly, Tyson submits these responses on behalf of itself and not for any other person or entity, including any person or entity that raises poultry under contract with Tyson.
- b. The definition of the term "documents and materials" is overly broad. Tyson submits these responses consistent with the definition of "documents" set forth in Fed.R.Civ.P. 34(a).
- c. The definition of the term "run-off/discharge/release" is overly broad, vague and misleading, and includes within its scope both acts of nature and volitional or negligent acts of persons, which cannot be characterized by a single term.
3. Tyson objects to any purported requirements of Plaintiff's discovery requests that are beyond the requirements of the Federal Rules of Civil Procedure.
4. Tyson objects to each and every discovery request to the extent that it seeks a response, document, information, or item which is protected from discovery and privileged by reason of: (a) the attorney-client communication privilege; (b) the "work product" doctrine; (c) the "trial preparation" doctrine; (d) the joint defense or "co-party" privilege; or (e) any other applicable discovery rule or privilege.
5. Tyson objects to any discovery request that seeks a response or document that would disclose mental impressions, conclusions, opinions, or legal theories of any representative of or attorney for Tyson concerning this lawsuit.

6. Tyson objects to each and every request to the extent it seeks information or the identification of documents concerning any claims or occurrences other than the claims and occurrences set forth in Plaintiff's First Amended Complaint for which Plaintiff requests relief.

7. Tyson objects to each request to the extent it seeks or relates to information or the identification of documents which are available to the public, and thus, equally available to Plaintiff.

8. Tyson objects to each request to the extent it seeks or relates to information or the identification of documents which are protected as confidential business information and proprietary and confidential trade secrets.

9. When the following responses state that Tyson will produce certain documents, or that responsive documents will be produced for a particular time period, Tyson is not assuring or guaranteeing that such documents for the particular time period have in fact been located or identified for production.

10. Tyson incorporates as though fully restated herein all objections and limitations to responses made by every other Defendant to the corresponding request for production of documents.

11. The foregoing objections apply to each and every response herein. By specifically incorporating individual General Objections in any response, Tyson does not waive the application of the remainder of the General Objections to such response.

12. Tyson specifically reserves the following:

- a. all questions and objections as to the privilege, competency, relevance, materiality and admissibility of any documents identified in response to these requests;

- b. the right to object on any or all of the foregoing grounds or on any other proper ground to the use of these responses or documents produced hereunder in any hearing in this proceeding or in any subsequent suit or proceeding;
- c. the right to object on any and all proper grounds, at any time, to other discovery procedures involving or relating to these responses or documents produced hereunder disclosed herein; and
- d. the right, at any time, upon proper showing, to revise, correct, or clarify any of the responses set forth herein.

Subject to these objections and subject to any additional objections set forth hereinafter, Tyson responds to Plaintiff's July 10, 2006 Set of Requests for Production to Tyson Poultry, Inc., as follows:

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and materials reflecting, referring to or relating to any contracts between you and poultry growers located in the Illinois River Watershed ("IRW) since 1970, including the contracts themselves, any amendments or changes to the contracts considered, proposed or adopted thereto, and any drafts of the contracts, amendments or changes.

RESPONSE TO REQUEST NO. 1: Tyson objects to Request No. 1 because it is overly broad and unduly burdensome. Request No. 1 seeks the production of documents covering a time period of more than thirty-five years. Tyson does not retain records responsive to Request No. 1. for that length of time. Additionally, Tyson objects to Request No. 1 because it seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence, as it requests documents older than the longest applicable statute of

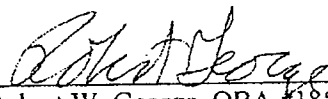
limitations. Tyson objects to Request No. 1 to the extent it requests the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Subject to and without waiving the foregoing objections or the General Objection, responsive documents may be found in the contract grower files produced to Plaintiff on June 15, 2006 as part of Tyson's Initial Disclosures.

REQUEST FOR PRODUCTION NO. 2: Please produce all documents and materials reflecting, referring to or relating to the ingredients and composition of your present and/or historical feed formulas used at poultry growing operations within the IRW.

RESPONSE TO REQUEST NO. 2: Tyson objects to Request No. 2 because it is overly broad and unduly burdensome. The time period for which Request No. 2 seeks the production of documents is unlimited. Further, Request No. 2 would require the production of each and every document related to feed used in the IRW for the unlimited time period. Tyson objects to Request No. 2 because it seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence, as it requests documents older than the longest applicable statute of limitations. Tyson objects to Request No. 2 to the extent that it seeks the production of documents which are protected from discovery because they contain highly confidential trade secrets. Tyson objects to Request No. 2 to the extent it requests the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Subject to and without waiving the foregoing objections or the General Objection, Tyson will produce its feed formulas utilized for poultry raised under contract with Tyson or by Tyson in the IRW from 2002 to the extent such responsive documents exist and in accordance with the terms of any Confidentiality Order entered in this case.

Respectfully Submitted,

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Attorneys for TYSON POULTRY, INC.

EXHIBIT C

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, et al.)	
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Plaintiffs,)	
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vs.)	05-CV-0329 TCK-SAJ
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**TYSON CHICKEN, INC.'S RESPONSES TO STATE OF OKLAHOMA'S
JULY 10, 2006 SET OF REQUESTS FOR PRODUCTION**

COMES NOW Defendant, TYSON CHICKEN, INC. (hereinafter referred to as "Defendant" or "Tyson"), and for its responses to State of Oklahoma's July 10, 2006 Requests for Production to Tyson Chicken, Inc. states as follows:

GENERAL OBJECTIONS

1. Each of the following responses is made without waiving any objections Defendant may have with respect to the subsequent use of these responses or any documents identified in response to these requests.

2. Tyson objects to, and does not agree to subject itself to, the arbitrary and extraordinary "definitions" ascribed by the Plaintiff to certain terms as set forth in its July 10, 2006 Set of Requests for Production to Tyson Chicken, Inc. To the extent that such terms appear in the Requests for Production of Documents and are in excess of the requirements of the Federal Rules of Civil Procedure, Tyson instead ascribes to the ordinary, everyday, and reasonably, commonly understood meanings which apply to such terms, and which also comply with the Federal Rules of Civil Procedure. Tyson objects to the definitions to the extent they assume

facts not in evidence or are related to facts or contentions in dispute in this action. Tyson also specifically objects to the following definitions:

- a. The definition of the term "You" is overly broad and includes within its scope persons and/or entities distinct from Tyson, and it includes within its scope persons who are protected from disclosure. Accordingly, Tyson submits these responses on behalf of itself and not for any other person or entity, including any person or entity that raises poultry under contract with Tyson.
 - b. The definition of the term "documents and materials" is overly broad. Tyson submits these responses consistent with the definition of "documents" set forth in Fed.R.Civ.P. 34(a).
 - c. The definition of the term "run-off/discharge/release" is overly broad, vague and misleading, and includes within its scope both acts of nature and volitional or negligent acts of persons, which cannot be characterized by a single term.
3. Tyson objects to any purported requirements of Plaintiff's discovery requests that are beyond the requirements of the Federal Rules of Civil Procedure.
 4. Tyson objects to each and every discovery request to the extent that it seeks a response, document, information, or item which is protected from discovery and privileged by reason of: (a) the attorney-client communication privilege; (b) the "work product" doctrine; (c) the "trial preparation" doctrine; (d) the joint defense or "co-party" privilege; or (e) any other applicable discovery rule or privilege.
 5. Tyson objects to any discovery request that seeks a response or document that would disclose mental impressions, conclusions, opinions, or legal theories of any representative of or attorney for Tyson concerning this lawsuit.

6. Tyson objects to each and every request to the extent it seeks information or the identification of documents concerning any claims or occurrences other than the claims and occurrences set forth in Plaintiff's First Amended Complaint for which Plaintiff requests relief.

7. Tyson objects to each request to the extent it seeks or relates to information or the identification of documents which are available to the public, and thus, equally available to Plaintiff.

8. Tyson objects to each request to the extent it seeks or relates to information or the identification of documents which are protected as confidential business information and proprietary and confidential trade secrets.

9. When the following responses state that Tyson will produce certain documents, or that responsive documents will be produced for a particular time period, Tyson is not assuring or guaranteeing that such documents for the particular time period have in fact been located or identified for production.

10. Tyson incorporates as though fully restated herein all objections and limitations to responses made by every other Defendant to the corresponding request for production of documents.

11. The foregoing objections apply to each and every response herein. By specifically incorporating individual General Objections in any response, Tyson does not waive the application of the remainder of the General Objections to such response.

12. Tyson specifically reserves the following:

- a. all questions and objections as to the privilege, competency, relevance, materiality and admissibility of any documents identified in response to these requests;

- b. the right to object on any or all of the foregoing grounds or on any other proper ground to the use of these responses or documents produced hereunder in any hearing in this proceeding or in any subsequent suit or proceeding;
- c. the right to object on any and all proper grounds, at any time, to other discovery procedures involving or relating to these responses or documents produced hereunder disclosed herein; and
- d. the right, at any time, upon proper showing, to revise, correct, or clarify any of the responses set forth herein.

Subject to these objections and subject to any additional objections set forth hereinafter, Tyson responds to Plaintiff's July 10, 2006 Set of Requests for Production to Tyson Chicken, Inc., as follows:

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and materials reflecting, referring to or relating to any contracts between you and poultry growers located in the Illinois River Watershed ("IRW) since 1970, including the contracts themselves, any amendments or changes to the contracts considered, proposed or adopted thereto, and any drafts of the contracts, amendments or changes.

RESPONSE TO REQUEST NO. 1: Tyson objects to Request No. 1 because it is overly broad and unduly burdensome. Request No. 1 seeks the production of documents covering a time period of more than thirty-five years. Tyson does not retain records responsive to Request No. 1. for that length of time. Additionally, Tyson objects to Request No. 1 because it seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence, as it requests documents older than the longest applicable statute of

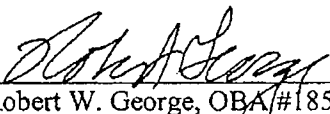
limitations. Tyson objects to Request No. 1 to the extent it requests the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Subject to and without waiving the foregoing objections or the General Objection, responsive documents may be found in the contract grower files produced to Plaintiff on June 15, 2006 as part of Tyson's Initial Disclosures.

REQUEST FOR PRODUCTION NO. 2: Please produce all documents and materials reflecting, referring to or relating to the ingredients and composition of your present and/or historical feed formulas used at poultry growing operations within the IRW.

RESPONSE TO REQUEST NO. 2: Tyson objects to Request No. 2 because it is overly broad and unduly burdensome. The time period for which Request No. 2 seeks the production of documents is unlimited. Further, Request No. 2 would require the production of each and every document related to feed used in the IRW for the unlimited time period. Tyson objects to Request No. 2 because it seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence, as it requests documents older than the longest applicable statute of limitations. Tyson objects to Request No. 2 to the extent that it seeks the production of documents which are protected from discovery because they contain highly confidential trade secrets. Tyson objects to Request No. 2 to the extent it requests the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Subject to and without waiving the foregoing objections or the General Objection, Tyson will produce its feed formulas utilized for poultry raised under contract with Tyson or by Tyson in the IRW from 2002 to the extent such responsive documents exist and in accordance with the terms of any Confidentiality Order entered in this case.

Respectfully Submitted,

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Attorneys for TYSON CHICKEN, INC.

EXHIBIT D

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA, et al.)	
)	
Plaintiffs,)	
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vs.)	05-CV-0329 TCK-SAJ
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COBB FOODS, INC., et al.,)	
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Defendants.)	

**COBB-VANTRESS, INC.'S RESPONSES TO STATE OF OKLAHOMA'S
JULY 10, 2006 SET OF REQUESTS FOR PRODUCTION**

COMES NOW Defendant, COBB-VANTRESS, INC. (hereinafter referred to as "Defendant" or "Cobb"), and for its responses to State of Oklahoma's July 10, 2006 Requests for Production to Cobb-Vantress, Inc. states as follows:

GENERAL OBJECTIONS

1. Each of the following responses is made without waiving any objections Defendant may have with respect to the subsequent use of these responses or any documents identified in response to these requests.

2. Cobb objects to, and does not agree to subject itself to, the arbitrary and extraordinary "definitions" ascribed by the Plaintiff to certain terms as set forth in its July 10, 2006 Set of Requests for Production to Cobb-Vantress, Inc. To the extent that such terms appear in the Requests for Production of Documents and are in excess of the requirements of the Federal Rules of Civil Procedure, Cobb instead ascribes to the ordinary, everyday, and reasonably, commonly understood meanings which apply to such terms, and which also comply with the Federal Rules of Civil Procedure. Cobb objects to the definitions to the extent they assume facts

not in evidence or are related to facts or contentions in dispute in this action. Cobb also specifically objects to the following definitions:

- a. The definition of the term "You" is overly broad and includes within its scope persons and/or entities distinct from Cobb, and it includes within its scope persons who are protected from disclosure. Accordingly, Cobb submits these responses on behalf of itself and not for any other person or entity, including any person or entity that raises poultry under contract with Cobb.
 - b. The definition of the term "documents and materials" is overly broad. Cobb submits these responses consistent with the definition of "documents" set forth in Fed.R.Civ.P. 34(a).
 - c. The definition of the term "run-off/discharge/release" is overly broad, vague and misleading, and includes within its scope both acts of nature and volitional or negligent acts of persons, which cannot be characterized by a single term.
3. Cobb objects to any purported requirements of Plaintiff's discovery requests that are beyond the requirements of the Federal Rules of Civil Procedure.
 4. Cobb objects to each and every discovery request to the extent that it seeks a response, document, information, or item which is protected from discovery and privileged by reason of: (a) the attorney-client communication privilege; (b) the "work product" doctrine; (c) the "trial preparation" doctrine; (d) the joint defense or "co-party" privilege; or (e) any other applicable discovery rule or privilege.
 5. Cobb objects to any discovery request that seeks a response or document that would disclose mental impressions, conclusions, opinions, or legal theories of any representative of or attorney for Cobb concerning this lawsuit.

6. Cobb objects to each and every request to the extent it seeks information or the identification of documents concerning any claims or occurrences other than the claims and occurrences set forth in Plaintiff's First Amended Complaint for which Plaintiff requests relief.

7. Cobb objects to each request to the extent it seeks or relates to information or the identification of documents which are available to the public, and thus, equally available to Plaintiff.

8. Cobb objects to each request to the extent it seeks or relates to information or the identification of documents which are protected as confidential business information and proprietary and confidential trade secrets.

9. When the following responses state that Cobb will produce certain documents, or that responsive documents will be produced for a particular time period, Cobb is not assuring or guaranteeing that such documents for the particular time period have in fact been located or identified for production.

10. Cobb incorporates as though fully restated herein all objections and limitations to responses made by every other Defendant to the corresponding request for production of documents.

11. The foregoing objections apply to each and every response herein. By specifically incorporating individual General Objections in any response, Cobb does not waive the application of the remainder of the General Objections to such response.

12. Cobb specifically reserves the following:

- a. all questions and objections as to the privilege, competency, relevance, materiality and admissibility of any documents identified in response to these requests;

- b. the right to object on any or all of the foregoing grounds or on any other proper ground to the use of these responses or documents produced hereunder in any hearing in this proceeding or in any subsequent suit or proceeding;
- c. the right to object on any and all proper grounds, at any time, to other discovery procedures involving or relating to these responses or documents produced hereunder disclosed herein; and
- d. the right, at any time, upon proper showing, to revise, correct, or clarify any of the responses set forth herein.

Subject to these objections and subject to any additional objections set forth hereinafter, Cobb responds to Plaintiff's July 10, 2006 Set of Requests for Production to Cobb-Vantress, Inc., as follows:

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: Please produce all documents and materials reflecting, referring to or relating to any contracts between you and poultry growers located in the Illinois River Watershed ("IRW) since 1970, including the contracts themselves, any amendments or changes to the contracts considered, proposed or adopted thereto, and any drafts of the contracts, amendments or changes.

RESPONSE TO REQUEST NO. 1: Cobb objects to Request No. 1 because it is overly broad and unduly burdensome. Request No. 1 seeks the production of documents covering a time period of more than thirty-five years. Cobb does not retain records responsive to Request No. 1. for that length of time. Additionally, Cobb objects to Request No. 1 because it seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence, as it requests documents older than the longest applicable statute of

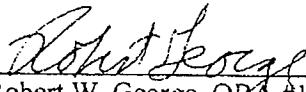
limitations. Cobb objects to Request No. 1 to the extent it requests the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Subject to and without waiving the foregoing objections or the General Objection, responsive documents may be found in the contract grower files produced to Plaintiff on June 15, 2006 as part of Cobb's Initial Disclosures.

REQUEST FOR PRODUCTION NO. 2: Please produce all documents and materials reflecting, referring to or relating to the ingredients and composition of your present and/or historical feed formulas used at poultry growing operations within the IRW.

RESPONSE TO REQUEST NO. 2: Cobb objects to Request No. 2 because it is overly broad and unduly burdensome. The time period for which Request No. 2 seeks the production of documents is unlimited. Further, Request No. 2 would require the production of each and every document related to feed used in the IRW for the unlimited time period. Cobb objects to Request No. 2 because it seeks the production of documents which are irrelevant and not likely to lead to the discovery of admissible evidence, as it requests documents older than the longest applicable statute of limitations. Cobb objects to Request No. 2 to the extent that it seeks the production of documents which are protected from discovery because they contain highly confidential trade secrets. Cobb objects to Request No. 2 to the extent it requests the production of documents which are protected from disclosure for the reasons set forth in General Objection No. 4. Subject to and without waiving the foregoing objections or the General Objection, Cobb will produce its feed formulas utilized for poultry raised under contract with Cobb or by Cobb in the IRW from 2002 to the extent such responsive documents exist and in accordance with the terms of any Confidentiality Order entered in this case.

Respectfully Submitted,

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